

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Data Release

For 1991, large foreign-owned domestic corporations reported receipts of \$60.5 billion and payments of \$134.0 billion in transactions with related "foreign persons" [1]. These 344 large corporations (with total receipts of \$500 million or more) also reported outstanding balances of \$63.5 billion in loans received from, and \$18.8 billion in loans granted to, related foreign persons (Table 1).

Sales and purchases of stock in trade accounted for the majority of the total receipts and payments with related foreign persons. Large foreign-owned domestic corporations sold \$46.9 billion and purchased \$114.4 billion of stock in trade for 1991, nearly 78 percent and 85 percent of the total receipts and payments, respectively. Although foreign-owned domestic manufacturers reported transactions with the largest number (3,770) of related foreign persons, foreign-owned domestic wholesalers and retailers reported the largest dollar volume of transactions. Transactions reported by foreign-owned domestic wholesalers and retailers accounted for more than half of the total receipts and payments (Table 2).

Nearly 40 percent of the 5,807 related foreign persons were "residents" of five countries: Japan, the United Kingdom, Germany, Switzerland, and Canada. Transactions with related foreign persons in these five countries of residence accounted for 79 percent of the total receipts and 77 percent of the total payments (Table 3). Transactions with Japanese related foreign persons, the largest source of receipts and payments, accounted for \$22.8 billion (38 percent) and \$64.5 billion (48 percent) of the totals, respectively. Nearly all of the receipts and payments connected with Japanese related persons were sales and purchases of stock in trade, primarily to or from foreign-owned domestic wholesalers and retailers. These wholesalers and retailers reported sales and purchases of stock in trade with Japanese related persons of \$18.7 billion and \$53.0 billion, respectively [2].

Stock in trade transactions generally dominated the receipts and payments reported in connection with related foreign persons in the other top five countries of residence as well. In transactions with Swiss related persons, foreign-owned domestic corporations classified in finance, insurance, and real estate accounted for the majority of the sales and purchases of stock in trade, reporting 84 percent of the total receipts of \$8.6 billion and 75 percent of the total payments of \$8.9 billion. Foreign-owned domestic wholesalers and retailers reported the majority of the stock

in trade transactions with United Kingdom related persons; 71 percent and 54 percent of the total sales (\$4.6 billion) and purchases (\$6.6 billion) of stock in trade, respectively. Foreign-owned domestic manufacturers, wholesalers, and retailers reported nearly all of the stock in trade transactions with German related persons. In transactions with Canadian related persons, foreign-owned domestic manufacturers accounted for 71 percent of the \$3.6 billion in sales and 69 percent of the \$6.7 billion in purchases of stock in trade. In addition, nearly all of the reported insurance transactions were between foreign-owned domestic insurance companies and Canadian related persons. These foreign-owned domestic insurance companies reported Canadian related-party transactions totaling \$1.2 billion out of the \$1.3 billion received and \$1.3 billion out of the \$2.7 billion paid, for insurance premiums [3].

Overall, based on year-end balances, foreign-owned domestic corporations borrowed \$63.5 billion, almost four times the amount they loaned (\$18.8 billion) to related foreign persons for 1991. Interest expense and income reflected these borrowing differences; interest paid to related foreign persons of \$6.4 billion exceeded the \$1.6 billion of interest received by four-fold. The total amount of loans outstanding from related foreign persons remained relatively stable for 1991, increasing less than 3 percent from the beginning balance of \$61.8 billion. Amounts loaned to related foreign persons increased by nearly 19 percent from \$15.9 billion. Transactions with related foreign persons whose residence was in the United Kingdom comprised the largest single portion of the loan transactions, accounting for \$23.3 billion (36 percent) of the loans received and \$10.4 billion (55 percent) of the loans granted. Nearly three-fourths of these loan transactions with related foreign persons in the United Kingdom were reported by foreign-owned domestic manufacturers.

Data Sources and Limitations

Prior to the Tax Equity and Fiscal Responsibility Act of 1982 (TEFRA), U.S. parent corporations were required to report transactions with and between their foreign affiliates [4]. However, no similar reporting requirements existed for transactions between domestic subsidiaries (i.e., incorporated in the United States) of foreign corporations or foreign corporations (i.e., incorporated abroad) engaged in a U.S. trade or business and their related foreign affiliates. Concerned that these related party transactions could be manipulated to avoid U.S. taxation, Congress added new reporting requirements as part of TEFRA to provide the Internal Revenue Service with more information about the nature and amount of these transactions.

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Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Under Internal Revenue Code section 6038A, domestic corporations that are 25-percent or more owned by a foreign person and foreign corporations engaged in a U.S. trade or business must report transactions with related foreign persons. The transactions are reported on Form 5472, *Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business*. Only domestic corporations are included in the statistics; foreign corporations engaged in a U.S. trade or business were not included, even though they may have filed Forms 5472 for transactions with related foreign persons.

The foreign-owned domestic corporation statistics, collected annually starting with 1988, include data from Forms 5472 for all U.S. corporations with total receipts of \$500 million or more that were owned (25-percent or more) by a foreign person and reported transactions with related foreign persons and that were included in the corporation *Statistics of Income* sample of U.S. corporation income tax returns with accounting periods ending July 1991 through June 1992. The corporation *Statistics of Income* sample included approximately 82,000 income tax returns chosen from the 3.8 million returns filed for Tax Year 1991. These returns were selected after administrative processing was complete, but before any audit examinations [5]. Corporations with total receipts of \$500 million or more were generally selected at the 100-percent rate for the sample. Table 1 presents statistics by the size of total receipts of the foreign-owned domestic corporations.

The statistics in this article augment the data for a portion of the returns included in the *Statistics of Income* data for domestic corporations "controlled" by foreign persons [6]. For 1991, the 344 large foreign-owned domestic corporations filing Forms 5472 accounted for only 0.7 percent of the returns, but 65 percent of the \$1.8 trillion in total assets, and 67 percent of the total receipts of \$1.1 trillion reported by all domestic corporations that were 25-percent-or-more "controlled" by foreign persons.

Explanation of Selected Terms

Amounts Borrowed and Loaned.--Both the beginning and ending balances of amounts borrowed and loaned by foreign-owned domestic corporations from and to, respectively, their related foreign persons, are presented in the statistics. However, because the ending balances reflect only the amounts outstanding at the end of the year, these amounts may not equal the actual amounts borrowed and loaned during Tax Year 1991.

Foreign-Owned Domestic Corporation.--For purposes of these statistics, a domestic corporation was considered foreign-owned if at least 25 percent of the total voting

power of all classes of stock entitled to vote, or 25 percent of the total value of all classes of stock of the corporation, was owned, directly or indirectly, at any time during the tax year by one foreign shareholder (usually a foreign parent corporation). This is in contrast to the other Statistics of Income data on foreign-owned domestic corporations which are based on 50-percent or more ownership by a foreign person.

Foreign Person.--The term "foreign person" generally includes (1) any partnership, association, company, or corporation that was not created or organized under the laws of the United States or the laws of any State; (2) any individual who is not a citizen or resident of the United States; (3) any individual who is a citizen of a U.S. possession, but is not otherwise a U.S. citizen or resident; and (4) any foreign trust, estate, or government. For the most part, the foreign persons are corporations.

Number of Foreign Persons.--The data shown in the tables generally represent the number of Forms 5472 attached to the 344 income tax returns filed by corporations with total receipts of \$500 million or more that were owned 25-percent or more by a foreign person. Member corporations of an affiliated group that filed a consolidated income tax return could also join in filing a consolidated Form 5472 for transactions with a given foreign related person. However, some affiliated corporations that could have filed consolidated Forms 5472, filed separate forms instead. When these forms were identified during statistical processing, the information on them was combined and the result treated as a single Form 5472. To this extent, the "number of persons" understates the actual number of Forms 5472 attached to the 344 income tax returns included in the statistics.

OPEC Countries.--Summary statistics are provided (Table 3) for the following Asian countries that were members of the Organization of Petroleum Exporting Countries (OPEC) for 1991: Indonesia, Iran, Iraq, Kuwait, Qatar, Saudi Arabia, and the United Arab Emirates. Summary statistics are also provided for the following OPEC countries located in Africa: Algeria, Gabon, Libya, and Nigeria. Data for Ecuador and Venezuela, also members of OPEC, are shown separately in Table 3.

Related Person.--Persons related to the domestic corporation that filed a Form 5472 include the 25-percent-or-more foreign shareholder, any person that was related to the reporting corporation or the 25-percent-or-more shareholder (as described in Internal Revenue Code section 267(b) or 707(b)(1)), or any other person that was related to the reporting corporation within the meaning of Internal Revenue Code section 482 and the associated regulations. See also "foreign person," above.

Residence of Related Person.--The income tax regula-

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tions related to Code section 6038A require that "each country in which each 25-percent shareholder files an income tax return as a resident under the tax laws of that country" be reported on Form 5472 for each related foreign person (Regulation Section 1.6038A-2). The statistics in Table 3 are based on this reported residence of the related foreign person and, within this meaning, the related foreign person is a "resident" of a particular foreign country.

Notes and References

[1] For 1991, the statistics were expanded to include reporting corporations with \$500 million or more in total receipts (i.e., receipts from sales and services, plus rental and investment income). In contrast, the statistics for 1990 and prior years were based on reporting corporations with \$1 billion or more in total receipts. The 1991 statistics in Table 1, which provide a distribution by size of total receipts, show that 194 foreign-owned domestic corporations with total receipts of \$1 billion or more reported \$51.2

billion of receipts from, and \$118.5 billion of payments to, related foreign persons. For 1990, by comparison, there were 187 corporations with \$69.1 billion of receipts and \$138.1 billion of payments.

[2] Based on unpublished data.

[3] Based on unpublished data.

[4] For data on these transactions for 1990, see Nutter, Sarah E., "Controlled Foreign Corporations, 1990," *Statistics of Income Bulletin*, Summer 1994, Volume 14, Number 1.

[5] For more information on the sample of corporation income tax returns for 1991, see *Statistics of Income--1991, Corporation Income Tax Returns*.

[6] The statistics on domestic corporations controlled by foreign persons for 1991 are reported in Hobbs, James R., "Domestic Corporations Controlled by Foreign Persons, 1991," *Statistics of Income Bulletin*, Winter 1994-1995, Volume 14, Number 3.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 1.--Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Size of Total Receipts of Corporations

[Money amounts are in thousands of dollars]

Item	Total	Size of total receipts	
		\$500 million under \$1 billion	\$1 billion or more
	(1)	(2)	(3)
Foreign-owned domestic corporations with total receipts of \$500 million or more			
Number of returns.....	344	150	194
Total assets.....	1,181,314,055	202,122,806	979,191,249
Total receipts.....	760,986,159	101,573,110	659,413,049
Income subject to U.S. tax.....	13,741,338	1,911,618	11,829,720
Total U.S. income tax after credits.....	3,716,202	462,394	3,253,808
Transactions between foreign-owned domestic corporations and related foreign persons			
Number of related foreign persons.....	5,807	1,603	4,204
Amounts received from related foreign persons:			
Total (excluding loan balances).....	60,466,912	9,237,408	51,229,504
Sales of stock in trade.....	46,924,850	4,827,155	42,097,695
Sales of other tangible property	774,889	528,319	246,570
Rents and royalties.....	344,392	121,812	222,580
Sales and leases of intangible property rights.....	698,171	449,818	248,353
Consideration received for services.....	3,053,010	633,716	2,419,294
Commissions received.....	589,851	169,701	420,150
Interest received.....	1,616,709	794,165	822,544
Premiums received for insurance or reinsurance.....	1,293,049	4,974	1,288,075
Other	5,171,991	1,707,742	3,464,249
Amounts borrowed:			
Beginning balance.....	61,838,385	13,465,806	48,372,579
Ending balance.....	63,454,943	12,310,717	51,144,226
Amounts paid to related foreign persons:			
Total (excluding loan balances).....	134,021,862	15,530,271	118,491,591
Purchases of stock in trade.....	114,433,480	10,369,387	104,064,093
Purchases of other tangible property.....	4,800,848	1,077,204	3,723,644
Rents and royalties.....	801,259	128,330	672,929
Purchases and leases of intangible property rights.....	475,577	98,126	377,451
Consideration paid for services.....	2,139,920	281,767	1,858,153
Commissions paid.....	668,639	513,500	155,139
Interest paid.....	6,450,787	1,721,273	4,729,514
Premiums paid for insurance.....	2,721,913	890,103	1,831,810
Other.....	1,529,439	450,580	1,078,859
Amounts loaned:			
Beginning balance.....	15,855,514	3,683,140	12,172,374
Ending balance.....	18,822,784	4,492,045	14,330,739

NOTE: Detail may not add to totals because of rounding.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 2.--Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Industrial Division of Corporation

[Money amounts are in thousands of dollars]

Industrial division	Number of returns	Total assets	Total receipts	Income subject to U.S. tax	Total U.S. income tax after credits
	(1)	(2)	(3)	(4)	(5)
All Industries.....	344	1,181,314,055	760,986,159	13,741,338	3,716,202
Agriculture, forestry, and fishing.....	--	--	--	--	--
Mining.....	7	26,747,304	8,990,946	605,589	49,249
Construction.....	5	3,530,317	5,133,862	738	72
Manufacturing.....	153	513,482,979	373,046,385	9,325,574	2,490,458
Transportation and public utilities.....	6	13,403,623	12,605,838	43,884	19,215
Wholesale and retail trade.....	119	164,950,620	286,296,636	1,840,800	613,316
Finance, insurance, and real estate.....	43	436,109,509	66,273,759	1,849,700	522,724
Services.....	11	23,089,703	8,638,734	75,053	21,169

Industrial division	Transactions between foreign-owned domestic corporations and related foreign persons				
	Number of related foreign persons	Amounts received from related foreign persons			
		Total (excluding loan balances)	Sales of stock in trade	Sales of other tangible property	Rents and royalties
	(6)	(7)	(8)	(9)	(10)
All Industries.....	5,807	60,466,912	46,924,850	774,889	344,392
Agriculture, forestry, and fishing.....	--	--	--	--	--
Mining.....	204	1,203,778	800,976	78,501	12,909
Construction.....	33	12,786	109	294	543
Manufacturing.....	3,770	12,857,015	9,015,303	101,978	196,046
Transportation and public utilities.....	49	160,284	1	--	40,944
Wholesale and retail trade.....	1,224	32,707,669	29,571,990	543,408	67,026
Finance, insurance, and real estate.....	308	13,257,010	7,506,451	48,128	26,520
Services.....	219	268,370	30,021	2,579	404

Industrial division	Transactions between foreign-owned domestic corporations and related foreign persons--continued				
	Amounts received from related foreign persons--continued				
	Sales and leases of intangible property rights	Consideration received for services	Commissions received	Interest received	Premiums received for insurance or reinsurance
	(11)	(12)	(13)	(14)	(15)
All Industries.....	698,171	3,053,010	589,851	1,616,709	1,293,049
Agriculture, forestry, and fishing.....	--	--	--	--	--
Mining.....	--	193,887	8,979	79,799	1,132
Construction.....	--	4,895	70	6,861	--
Manufacturing.....	389,497	1,525,827	71,362	508,534	732
Transportation and public utilities.....	--	1,216	79,024	14,100	--
Wholesale and retail trade.....	115,001	1,257,312	207,780	205,209	4,670
Finance, insurance, and real estate.....	--	63,099	213,736	793,986	1,286,496
Services.....	193,672	6,774	8,900	8,221	20

NOTE: Detail may not add to totals because of rounding.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 2.—Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Industrial Division of Corporation—Continued
[Money amounts are in thousands of dollars]

Industrial division	Transactions between foreign-owned domestic corporations and related foreign persons--continued				
	Amounts received from related foreign persons--continued	Amounts borrowed		Amounts paid to related foreign persons	
	Other	Beginning balance	Ending balance	Total (excluding loan balances)	Purchases of stock in trade
	(16)	(17)	(18)	(19)	(20)
All Industries.....	5,171,991	61,838,385	63,454,943	134,021,862	114,433,480
Agriculture, forestry, and fishing.....	--	--	--	--	--
Mining.....	27,595	627,893	678,999	842,776	558,480
Construction.....	15	58,520	62,113	241,161	206,058
Manufacturing.....	1,047,735	40,548,570	42,006,192	39,960,544	31,132,220
Transportation and public utilities.....	25,000	2,014,099	1,745,066	299,805	23
Wholesale and retail trade.....	735,273	8,735,881	8,824,342	80,348,131	75,461,684
Finance, insurance, and real estate.....	3,318,594	8,025,811	8,582,193	11,914,345	7,058,187
Services.....	17,779	1,827,610	1,556,037	415,101	16,828

Industrial division	Transactions between foreign-owned domestic corporations and related foreign persons--continued				
	Amounts paid to related foreign persons--continued				
	Purchases of other tangible property	Rents and royalties	Purchases and leases of intangible property rights	Consideration paid for services	Commissions paid
	(21)	(22)	(23)	(24)	(25)
All Industries.....	4,800,848	801,259	475,577	2,139,920	668,639
Agriculture, forestry, and fishing.....	--	--	--	--	--
Mining.....	11,187	6,352	2,165	97,376	11,806
Construction.....	--	--	--	21,101	--
Manufacturing.....	1,403,626	506,173	441,521	1,622,743	529,223
Transportation and public utilities.....	100	12,703	764	16,392	1,518
Wholesale and retail trade.....	3,385,358	222,735	26,273	152,744	83,244
Finance, insurance, and real estate.....	542	1,285	--	222,070	42,669
Services.....	36	52,012	4,855	7,495	180

Industrial division	Transactions between foreign-owned domestic corporations and related foreign persons--continued				
	Amounts paid to related foreign persons--continued		Amounts loaned		
	Interest paid	Premiums paid for insurance	Other	Beginning balance	Ending balance
	(26)	(27)	(28)	(29)	(30)
All Industries.....	6,450,787	2,721,913	1,529,439	15,855,514	18,822,784
Agriculture, forestry, and fishing.....	--	--	--	--	--
Mining.....	142,678	8,839	3,894	809,055	935,284
Construction.....	9,443	674	3,885	140,725	130,584
Manufacturing.....	3,576,420	59,182	689,437	10,176,559	11,629,034
Transportation and public utilities.....	219,923	48,384	--	325,142	57,635
Wholesale and retail trade.....	653,719	72,240	290,133	1,753,342	2,361,917
Finance, insurance, and real estate.....	1,528,233	2,532,336	529,024	2,100,594	2,786,142
Services.....	320,371	258	13,065	550,097	922,187

NOTE: Detail may not add to totals because of rounding.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 3.--Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person

[Money amounts are in thousands of dollars]

Selected country	Number of returns	Total assets	Total receipts	Income subject to U.S. tax	Total U.S. income tax after credits
	(1)	(2)	(3)	(4)	(5)
All countries.....	344	1,181,314,055	760,986,159	13,741,338	3,716,202
Canada.....	177	701,774,196	441,789,259	6,561,437	2,115,777
Latin America, total.....	110	442,108,701	346,248,629	4,969,269	1,530,248
Argentina.....	30	226,857,221	138,779,751	1,695,022	491,885
Brazil.....	66	309,196,199	266,091,016	3,502,350	1,097,459
Ecuador.....	21	76,706,181	91,596,109	708,261	193,568
Mexico.....	76	290,147,924	262,047,819	2,909,926	893,973
Panama.....	26	209,700,863	148,684,778	1,505,627	407,565
Venezuela.....	38	235,004,421	185,968,105	1,460,957	426,085
Other Western Hemisphere, total.....	45	278,310,188	137,017,201	1,330,441	399,919
Bahamas.....	7	169,730,076	45,519,019	660,909	156,944
Bermuda.....	23	167,224,244	79,192,691	742,744	246,844
Netherlands Antilles.....	19	51,841,938	51,321,111	301,089	92,047
Europe, total.....	279	976,080,918	626,072,444	10,037,314	2,935,545
Austria.....	35	216,157,619	142,533,459	1,478,101	433,144
Belgium.....	69	336,952,253	254,647,233	4,648,294	1,386,349
Denmark.....	36	169,704,199	111,257,676	1,376,935	406,974
France.....	112	422,172,831	329,283,748	5,283,432	1,642,467
Greece.....	15	138,116,659	81,083,508	1,015,575	300,286
Germany.....	127	454,705,990	365,150,192	5,632,451	1,657,344
Ireland.....	38	164,451,445	112,029,100	2,763,113	865,383
Italy.....	81	334,483,002	243,648,332	2,930,228	928,685
Netherlands.....	148	646,406,831	388,740,982	6,143,365	1,728,110
Norway.....	38	181,483,063	118,234,191	2,468,312	624,085
Spain.....	65	302,194,119	220,101,509	2,948,931	930,026
Sweden.....	52	220,099,027	161,050,337	1,547,514	480,326
Switzerland.....	78	411,776,664	214,261,843	2,738,058	838,271
United Kingdom.....	196	783,845,079	496,272,745	8,761,949	2,576,820
Africa, total.....	53	241,880,598	165,625,350	2,196,231	698,822
OPEC countries ²	6	103,306,641	49,689,993	495,288	141,874
South Africa.....	34	99,204,820	75,912,517	1,494,374	465,122
Asia, total.....	200	821,325,408	530,569,685	9,387,189	2,535,779
Hong Kong.....	101	421,228,508	305,700,053	4,568,523	1,404,749
Japan.....	147	644,042,714	413,017,460	6,725,932	1,726,456
Malaysia.....	48	222,218,586	173,559,294	3,391,969	1,019,509
Middle East countries ³	8	158,717,947	55,979,809	427,292	96,990
OPEC countries ⁴	30	175,191,867	109,063,135	1,208,691	363,816
Philippines.....	22	159,039,454	101,406,788	1,420,138	417,785
Singapore.....	87	364,733,121	257,973,421	3,975,317	1,222,336
South Korea.....	40	219,531,215	144,189,611	1,225,336	378,880
Thailand.....	39	194,864,696	176,740,833	1,528,134	483,392
Taiwan.....	46	226,341,055	174,302,679	2,097,976	620,050
Oceania.....	131	550,646,027	362,114,382	5,523,033	1,769,172
Puerto Rico and U.S. Possessions.....	20	156,218,371	101,887,029	1,027,226	317,366

Footnotes at end of table.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 3.—Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person—Continued

[Money amounts are in thousands of dollars]

Selected country	Transactions between foreign-owned domestic corporations and related foreign persons					
	Number of related foreign persons	Amounts received from related foreign persons				
		Total (excluding loan balances)	Sales of stock in trade	Sales of other tangible property	Rents and royalties	Sales and leases of intangible property rights
	(6)	(7)	(8)	(9)	(10)	(11)
All countries.....	5,807	60,466,912	46,924,850	774,889	344,392	698,171
Canada.....	365	5,504,764	3,642,469	80,860	26,273	46,945
Latin America, total.....	626	891,528	790,272	13,481	5,637	1,456
Argentina.....	43	24,518	22,127	672	--	--
Brazil.....	115	84,780	80,879	1,862	--	45
Ecuador.....	26	11,771	9,724	--	--	--
Mexico.....	133	396,819	376,193	331	496	1,235
Panama.....	59	218,062	180,022	5,507	4,229	73
Venezuela.....	61	75,950	65,351	49	849	4
Other Western Hemisphere, total.....	78	764,127	320,518	29,391	24,465	--
Bahamas.....	9	24,773	873	--	23,343	--
Bermuda.....	28	335,804	285,143	1	--	--
Netherlands Antilles.....	27	268,584	29,678	140	12	--
Europe, total.....	3,171	23,668,634	17,212,040	118,113	239,751	318,658
Austria.....	51	8,961	7,742	7	--	--
Belgium.....	124	862,204	748,055	545	4,163	85
Denmark.....	62	161,520	14,367	1	41,838	(⁵)
France.....	325	1,002,850	758,820	24,919	7,792	66,029
Greece.....	19	7,307	7,255	--	--	--
Germany.....	444	3,594,076	1,275,446	22,507	30,148	4,330
Ireland.....	51	110,221	41,590	(⁵)	1,964	--
Italy.....	168	128,025	93,163	865	2,686	1,947
Netherlands.....	327	1,218,788	617,939	1,669	22,571	113,802
Norway.....	70	70,423	20,659	22	565	--
Spain.....	112	62,017	46,945	584	1,022	2,217
Sweden.....	176	322,027	199,012	1,611	3,285	207
Switzerland.....	199	9,535,150	8,594,975	27,789	789	2,739
United Kingdom.....	925	6,357,584	4,627,104	18,083	121,057	127,303
Africa, total.....	112	213,860	51,264	4,364	1,968	2,052
OPEC countries ²	10	17,727	94	4,351	3	--
South Africa.....	48	26,089	24,642	6	594	66
Asia, total.....	1,080	27,032,714	22,843,575	526,049	33,086	314,593
Hong Kong.....	170	1,514,989	1,482,483	31	1,389	511
Japan.....	384	22,835,107	19,340,251	510,481	21,529	101,774
Malaysia.....	75	81,821	80,101	552	--	86
Middle East countries ³	11	3,649	638	--	--	--
OPEC countries ⁴	55	881,364	476,648	953	9,145	172,048
Philippines.....	31	21,179	20,710	2	67	--
Singapore.....	134	473,901	455,272	1,110	937	53
South Korea.....	50	829,496	615,671	204	--	40,061
Thailand.....	58	36,921	34,269	--	--	--
Taiwan.....	55	40,196	34,441	4,644	--	59
Oceania.....	331	320,055	236,887	2,549	13,213	14,467
Puerto Rico and U.S. Possessions.....	26	118,424	32,728	82	--	--

Footnotes at end of table.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 3.—Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person—Continued

(Money amounts are in thousands of dollars)

Selected country	Transactions between foreign-owned domestic corporations and related foreign persons—continued						
	Amounts received from related foreign persons—continued					Amounts borrowed	
	Consideration received for services	Commissions received	Interest received	Premiums received for insurance or reinsurance	Other	Beginning balance	Ending balance
	(12)	(13)	(14)	(15)	(16)	(17)	(18)
All countries.....	3,053,010	589,851	1,616,709	1,293,049	5,171,991	61,838,385	63,454,943
Canada.....	83,533	8,011	57,482	1,228,350	330,841	811,097	1,160,879
Latin America, total.....	42,945	14,972	4,212	1,591	16,962	542,536	523,434
Argentina.....	1,044	51	38	584	2	7,272	3,500
Brazil.....	592	973	152	--	275	79	2,262
Ecuador.....	1,512	96	171	--	(⁵)	--	616
Mexico.....	13,647	1,405	526	--	2,987	5,404	7,624
Panama.....	18,923	1,566	318	766	6,658	529,338	431,392
Venezuela.....	5,615	113	92	241	3,638	72	396
Other Western Hemisphere, total.....	141,905	1,270	8,459	80	238,043	3,789,432	5,124,288
Bahamas.....	82	29	446	--	--	--	7,896
Bermuda.....	42,345	789	7,164	1	362	85,341	103,195
Netherlands Antilles.....	570	387	827	--	236,970	3,689,002	5,011,467
Europe, total.....	1,577,870	292,172	1,298,862	56,150	2,555,019	49,723,670	49,604,587
Austria.....	584	(⁵)	1	550	78	--	665
Belgium.....	22,893	1,446	60,537	753	23,726	739,669	800,519
Denmark.....	938	79,085	1	--	25,291	1,011	350,519
France.....	106,847	3,923	21,461	2,479	10,580	1,011,553	1,323,340
Greece.....	1	--	--	--	50	29	--
Germany.....	514,641	27,802	42,108	4,720	1,672,373	5,051,834	2,844,531
Ireland.....	3,450	76	5,417	--	57,724	350,553	361,468
Italy.....	20,386	12	580	483	7,901	4,238	3,085
Netherlands.....	240,599	2,733	79,148	551	139,776	15,265,825	15,867,508
Norway.....	5,236	778	31,177	17	11,969	301,935	141,689
Spain.....	10,028	324	18	93	786	49,378	72,080
Sweden.....	19,245	578	2,467	--	95,624	648,749	657,612
Switzerland.....	108,662	23,822	324,617	30,852	420,904	2,255,898	3,174,162
United Kingdom.....	480,410	151,243	731,328	15,585	85,470	22,454,622	23,399,636
Africa, total.....	108,802	40,914	457	--	4,039	7,826	13,163
OPEC countries ²	13,275	--	--	--	4	--	--
South Africa.....	332	14	435	--	(⁵)	6,952	10,687
Asia, total.....	949,147	210,343	223,575	5,879	1,926,467	5,672,155	5,482,319
Hong Kong.....	2,416	2,415	10,757	--	14,986	444,857	480,626
Japan.....	721,144	168,162	159,061	5,072	1,807,631	5,015,939	4,768,442
Malaysia.....	595	131	--	332	25	781	39
Middle East countries ³	2,987	12	10	--	(⁵)	--	--
OPEC countries ⁴	206,576	12,040	12	--	3,942	33,711	36,459
Philippines.....	155	18	--	56	171	--	--
Singapore.....	10,908	3,886	20	236	1,478	610	13,184
South Korea.....	1,139	22,896	51,670	--	97,856	143,720	136,285
Thailand.....	620	--	1,949	--	82	--	2,649
Taiwan.....	50	685	84	183	50	--	570
Oceania.....	25,790	8,314	14,718	1,000	3,117	347,768	249,684
Puerto Rico and U.S. Possessions.....	50,717	(⁵)	463	--	34,435	62	89

Footnotes at end of table.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 3.--Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person--Continued

[Money amounts are in thousands of dollars]

Selected country	Transactions between foreign-owned domestic corporations and related foreign persons--continued				
	Amounts paid to related foreign persons				
	Total (excluding loan balances)	Purchases of stock in trade	Purchases of other tangible property	Rents and royalties	Purchases and leases of intangible property rights
	(19)	(20)	(21)	(22)	(23)
All countries.....	134,021,862	114,433,480	4,800,848	801,259	475,577
Canada.....	8,966,177	6,730,248	48,446	7,611	3,238
Latin America, total.....	3,901,208	3,695,876	102	984	43
Argentina.....	3,142	942	--	--	--
Brazil.....	242,956	237,245	--	--	7
Ecuador.....	1,061	615	--	--	--
Mexico.....	697,720	683,520	77	984	36
Panama.....	59,611	7,605	18	--	--
Venezuela.....	2,709,407	2,688,923	--	--	--
Other Western Hemisphere, total.....	713,584	209,718	216	--	--
Bahamas.....	31,278	16,868	--	--	--
Bermuda.....	209,744	189,915	--	--	--
Netherlands Antilles.....	469,817	2,732	--	--	--
Europe, total.....	40,310,232	29,757,655	2,121,481	508,884	335,695
Austria.....	10,864	10,546	--	--	--
Belgium.....	559,461	444,390	252	2,246	5,735
Denmark.....	27,738	17,135	--	24	--
France.....	2,967,657	1,199,316	1,464,757	52,385	435
Greece.....	3,253	3,076	--	--	--
Germany.....	9,999,067	9,233,924	68,081	175,214	17,301
Ireland.....	184,096	112,573	--	1,083	--
Italy.....	306,681	274,034	8,361	39	12
Netherlands.....	3,209,379	360,360	556,336	83,433	54,500
Norway.....	181,652	171,857	93	3,252	15
Spain.....	88,839	81,821	1,337	20	--
Sweden.....	2,406,126	2,261,538	--	18,974	25,313
Switzerland.....	9,891,081	8,890,702	651	42,139	200,755
United Kingdom.....	10,234,604	6,563,065	21,604	125,858	31,531
Africa, total.....	638,846	492,703	--	--	128,306
OPEC countries ²	3	--	--	--	--
South Africa.....	12,602	12,497	--	--	50
Asia, total.....	75,144,539	70,002,544	2,115,230	260,176	3,400
Hong Kong.....	1,674,154	1,613,739	--	275	1
Japan.....	64,588,483	60,246,748	1,936,733	259,828	3,399
Malaysia.....	183,993	171,232	6	--	--
Middle East countries ³	19,971	--	--	--	--
OPEC countries ⁴	3,495,191	2,984,581	7	--	--
Philippines.....	112,212	112,030	--	--	--
Singapore.....	3,531,516	3,020,873	--	53	--
South Korea.....	1,452,697	1,451,410	--	--	--
Thailand.....	168,672	111,854	56,211	19	--
Taiwan.....	173,661	168,609	2,515	--	--
Oceania.....	605,112	494,085	14,105	4,126	4,895
Puerto Rico and U.S. Possessions.....	861,508	369,221	491,572	--	--

Footnotes at end of table.

Transactions Between Large Foreign-Owned Domestic Corporations and Related Foreign Persons, 1991

Table 3.—Foreign-Owned Domestic Corporations with Total Receipts of \$500 Million or More: Transactions Between Corporations and Related Foreign Persons, by Selected Country of Residence of Related Foreign Person—Continued

[Money amounts are in thousands of dollars]

Selected country	Transactions between foreign-owned domestic corporations and related foreign persons—continued						
	Amounts paid to related foreign persons—continued					Amounts loaned	
	Consideration paid for services	Commissions paid	Interest paid	Premiums paid for insurance	Other	Beginning balance	Ending balance
	(24)	(25)	(26)	(27)	(28)	(29)	(30)
All countries.....	2,139,920	668,639	6,450,787	2,721,913	1,529,439	15,855,514	18,822,784
Canada.....	473,034	9,539	187,214	1,358,782	148,066	496,698	307,851
Latin America, total.....	8,494	9,398	49,462	107,364	29,485	60,494	220,123
Argentina.....	535	673	561	--	429	1,108	2,382
Brazil.....	9	2,152	2,799	--	745	46,906	39,487
Ecuador.....	--	392	--	--	54	219	349
Mexico.....	4,413	4,833	869	--	2,989	2,860	10,487
Panama.....	3,236	40	42,934	484	5,295	7,375	25,526
Venezuela.....	46	485	9	--	19,945	685	4,164
Other Western Hemisphere, total.....	30,924	--	413,116	57,480	2,130	54,288	56,820
Bahamas.....	14,357	--	53	--	--	--	--
Bermuda.....	617	--	5,080	13,894	237	1,083	3,415
Netherlands Antilles.....	15,389	--	407,810	43,586	301	53,204	53,405
Europe, total.....	830,609	552,502	5,161,092	316,235	726,078	12,331,196	15,604,550
Austria.....	63	164	--	--	92	619	2,037
Belgium.....	26,692	1,501	74,392	500	3,754	476,769	725,519
Denmark.....	4	764	9,739	--	72	486	611
France.....	98,310	3,411	134,400	5,122	9,522	243,147	1,249,900
Greece.....	--	23	--	--	154	110	159
Germany.....	46,494	4,038	213,968	146,269	93,778	131,247	648,707
Ireland.....	322	--	37,078	--	33,039	59,909	97,384
Italy.....	18,640	4,957	60	135	443	36,083	35,389
Netherlands.....	135,270	475,521	1,514,112	12,289	17,559	1,290,045	1,828,390
Norway.....	759	325	4,045	1,046	260	53	7,519
Spain.....	559	126	4,401	--	574	2,228	2,115
Sweden.....	35,969	1,219	48,903	1,370	12,840	64,415	67,046
Switzerland.....	65,271	3,941	529,050	75,597	82,976	518,709	580,009
United Kingdom.....	397,064	56,365	2,499,083	73,907	466,127	9,459,760	10,359,231
Africa, total.....	1,951	12,011	1,130	--	2,746	188	327
OPEC countries ²	--	3	--	--	--	--	--
South Africa.....	23	13	--	--	19	182	311
Asia, total.....	691,244	66,196	510,154	881,149	614,447	2,322,188	1,931,210
Hong Kong.....	1,497	8,419	48,074	--	2,149	295,623	145,651
Japan.....	152,536	50,052	452,583	876,374	610,230	1,305,355	1,116,137
Malaysia.....	12,567	163	--	--	25	1,038	118
Middle East countries ³	19,939	6	26	--	--	--	100
OPEC countries ⁴	501,237	85	9,312	--	2	13	1,391
Philippines.....	--	181	--	--	1	--	--
Singapore.....	3,078	1,880	157	4,775	1,611	648	1,188
South Korea.....	158	1,084	--	--	45	698,451	631,147
Thailand.....	--	362	--	--	227	20,698	20,589
Taiwan.....	65	2,353	1	--	118	226	14,751
Oceania.....	34,678	909	46,054	828	5,431	579,658	688,258
Puerto Rico and U.S. Possessions.....	--	--	598	50	66	8,282	10,578

¹Columns 1 through 5 are not additive because a given corporation could have related foreign persons in more than one country.

²Includes Algeria, Gabor, Libya, and Nigeria.

³Includes Bahrain, Cyprus, Gaza Strip, Israel, Jordan, Lebanon, Oman, Syria, and Yemen. Excludes OPEC countries.

⁴Includes Indonesia, Iran, Iraq, Kuwait, Qatar, Saudi Arabia, and the United Arab Emirates.

⁵Less than \$500.

NOTE: Detail may not add to totals because of rounding.